



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

**SEP 13 2017**

**URGENT LEGAL MATTER  
REQUIRES PROMPT RESPONSE**

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Lloyd Grunvald  
Vice President of Manufacturing  
Preci Manufacturing Incorporated  
400 Weaver Street  
Winooski, VT 05404

Re: Clean Air Act Reporting Requirement

Dear Mr. Grunvald:

The United States Environmental Protection Agency ("EPA") is evaluating whether Preci-Manufacturing Incorporated's facility in Winooski, VT ("Preci") is in compliance with the Clean Air Act (the "Act") and state and federal regulations promulgated under the Act. These regulations include the National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning found at 40 CFR Part 63, Subpart T ("Subpart T"), and the federally enforceable sections of the Vermont state implementation plan ("SIP") for solvent metal cleaning found at Vermont Air Pollution Control Regulation 5-253.14.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether a facility is in compliance with the Clean Air Act.

Therefore, within 45 days of the date Preci receives this reporting requirement, Preci is required to provide all of the information outlined below for its Winooski facility. Where appropriate submit responses in an electronic spreadsheet format that is compatible with Microsoft Excel. Provide a separate numbered response to each numbered paragraph or subparagraph below:

1. Describe the current ownership and corporate structure of Preci. Specifically:
  - a. List any partners or corporate officers;
  - b. List any parent and subsidiary corporations;
  - c. Provide Preci's date of incorporation; and
  - d. Provide Preci's current number of employees.

2. Provide copies of all correspondence between Preci and EPA and/or the Vermont Department of Environmental Conservation regarding compliance with federal or state air pollution control standards for degreasers.
3. For all degreasers located at the facility, provide the dates of purchase and installation. If any degreaser was used previously at another Preci facility, provide the address of the that facility as well as the prior date of installation.
4. For the Baron Blakeslee (MD-MLR-120) degreaser provide:
  - a. Copies of the manufacturer's specifications, the user's manual, operating requirements, and a description of the degreaser;
  - b. A description of all air pollution controls used on the degreaser, including, but not limited to all shut off control devices and freeboard refrigeration devices, tightly fitting cover, lip exhaust system, etc. (see 40 CFR § 63.463);
  - c. The dimensions of the basket used to load parts into the degreaser;
  - d. The height at which parts are processed in the degreaser;
  - e. A description of how TCE is added and drained from the degreaser (see 40 CFR § 63.463);
  - f. Copies of any and all records from January 1, 2012 to the date of receipt of this letter documenting control device monitoring, including but not limited to:
    - i. machine idling and downtime cover condition;
    - ii. solvent temperature (heating and cooling);
    - iii. hoist speed; and
    - iv. room draft (see 40 CFR § 63.466).
  - g. Copies of any and all statements provided to Preci from the manufacturer or vendor regarding the square footage of the *solvent/air interface area* and the *freeboard height* of the degreaser. If such statements do not exist, state whether Preci has determined the *solvent/air interface area* and the *freeboard height* and provide supporting documentation; and
  - h. Documentation that all operators of the degreaser have completed and passed the applicable sections of the "Test of Solvent Cleaning Procedures" (see 40 CFR § 63.463).
5. Identify the cleaning solvents used in all degreasing units and provide copies of their materials safety data sheets. Specifically, between January 1, 2012 and the present provide copies of:
  - a. The annual amount of each solvent purchased;
  - b. The annual quantity of waste degreaser solvent shipped offsite; and
  - c. The actual percentage of halogenated solvent in the waste (if known).
6. Provide the dimensions, speed, and rated flow of the lip exhaust ventilation system located next to the degreaser.
7. Provide any and all data from monitoring and/or TCE concentration sampling of the lip exhaust system (see 40 CFR § 63.463 and § 63.466).

8. Provide the maximum flow rate of the floor fan that was located in the same room as the Baron Blakeslee degreaser on July 13, 2017.

As discussed at your facility during EPA's inspection on July 13, 2017, there are a number of resources available to facilities using TCE. For example, please see the link below to the Massachusetts Toxics Use Reduction Institute's (TURI's) website. Although based in Massachusetts, TURI often provides assistance to companies located outside of Massachusetts.

[http://www.turi.org/Our\\_Work/Cleaning\\_Laboratory/Past\\_Projects/Trichloroethylene-and-Chlorinated-Solvents-Reduction](http://www.turi.org/Our_Work/Cleaning_Laboratory/Past_Projects/Trichloroethylene-and-Chlorinated-Solvents-Reduction)

Be aware that if Preci does not provide all the information required under this Reporting Requirement on the schedule set out above, EPA may order it to comply and may assess monetary penalties under Section 113 of the Act, 42 U.S.C. § 7413. Note that federal law also establishes criminal penalties for providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). No information provided under a claim of confidentiality should be sent by email. Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B. Note that certain categories of information, such as emission data, are not properly the subject of such a claim. If no such claim accompanies the information when EPA receives it, EPA may make the information available to the public without further notice to you. Please be aware that states may have different rules and regulations governing the protection of confidential business information.

Provide the above-required information to:

Susan Studlien, Director  
Office of Environmental Stewardship (Mail Code: OES04-02)  
U.S. Environmental Protection Agency, Region I  
5 Post Office Square, Suite 100  
Boston, Massachusetts 02109-3912  
Attn: Abdi Mohamoud, Air Technical Unit

and to:

John Wakefield, Compliance Section Chief  
Air Quality and Climate Division  
Davis Building, 2<sup>nd</sup> Floor  
1 National Life Drive  
Montpelier, VT 05620-3802

If you have any questions regarding this reporting requirement, please contact Abdi Mohamoud, Environmental Engineer at (617) 918-1858 or have your attorney call Senior Enforcement Counsel Thomas Olivier at (617) 918-1737.

Sincerely,

A handwritten signature in cursive script that reads "Susan Studlien".

Susan Studlien, Director  
Office of Environmental Stewardship

Enclosure

Cc: John Wakefield, VT DEC